

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE : CHAPTER 13
MARKEYES ANDERSON : CASE NO: 22-11238MDC
Debtor :

:

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

The Debtor, through counsel, responds to the motion of Kenneth E. West, Esquire, Chapter 13 Standing Trustee (the "Trustee"), to dismiss (the "Motion") as follows:

1. The Motion asserts that Debtor is not making payments.
2. Debtor concedes to the arrears, but Debtor has been suffering medical issues due to a congenital defect that have impaired his ability to work his current position as a train operator for Southeastern Pennsylvania Transportation Authority (SEPTA).
3. Debtor had surgery in March 2024 and is currently undergoing six months of rehabilitation, after which he expects to resume his employment.
4. Debtor's counsel is in the process to preparing a motion to modify the plan.

WHEREFORE, Debtor prays that this Court enter an Order DENYING the Motion without prejudice.

/s/ Alfonso G. Madrid
ALFONSO MADRID, ESQ.
Community Legal Services of Philadelphia
Attorney for Debtor
1410 W. Erie Ave.
Philadelphia PA 19140
(215) 215-227-4795
(215)227-2435
amadrid@clsphila.org